

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 25-20021-CR-GAYLES

UNITED STATES OF AMERICA,

v.

EMANUEL ASHTOR,

Defendant.

_____ /

MOTION FOR PERMISSION TO CHANGE RESIDENCE

Defendant, **EMANUEL ASHTOR**, by and through undersigned counsel, hereby files this Motion for Permission to Change Residence and in support states:

1. On January 21, 2025, the United States filed a Sealed Indictment. Defendant was subsequently arrested on January 22, 2025.
2. On January 22, 2025, an Order granting the United States' Motion to Unseal the Indictment was granted. [DE 6]. The Indictment charges the Defendants with Conspiracy to Damage a Protected Computer in violation of 18 U.S.C. § 371 (Count 1); Conspiracy to Commit Wire Fraud and Mail Fraud in violation of 18 U.S.C. § 1349 (Count 2); Conspiracy to Commit Money Laundering in violation of 18 U.S.C. § 1956(h) (Count 3); and Conspiracy to Transfer False Identification Documents in violation of 18 U.S.C. § 1028(a)(2) and (f). [DE 3].
3. On February 6, 2025, Defendant was arraigned in this matter and was released from custody subject to the standard pre-trial release conditions. [DE 15].
4. Since his arrest and release from custody, Defendant has complied with the pre-trial release conditions.

5. Due to financial hardship, the Defendant and his wife have been forced to downsize and move closer to family. Additionally, this relocation places Defendant closer to his place of employment.
6. The proposed new address is: 655 Granite Road, Apt. 2, Kerhonkson, NY 12446.
7. The proposed change of residence will not affect Defendant's ability to comply with all other conditions of his pretrial release and Defendant will continue to report as required and abide by all other conditions of release previously imposed by this Court.
8. Defendant has provided notice of the change of address to Pre-trial Services, Officer Rodrick Burnette, who indicated that he has no objection and provided Defendant with the steps necessary to complete the process, including sharing the new residential address with Officer Burnette so he can coordinate with the probation officer in the new district.

CERTIFICATE OF CONFERRAL PURSUANT TO LOCAL RULE 88.9

On June 16, 2025, the undersigned conferred with AUSA Gregory Jon Nicosia regarding the substance of this motion who advised that the Government does not object to the Court granting this Motion.

WHEREFORE, the Defendant prays that this Honorable Court will grant the relief requested herein and for any other relief the Court deems fair and just.

Respectfully submitted,
**QUINTERO BROCHE &
FONSECA-NADER, P.A.**
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BY: /s/ Frank Quintero, Jr.
FRANK QUINTERO, JR.
Florida Bar No.: 399167

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 16, 2025, a true and correct copy of the foregoing has been filed and served on all counsel of record via CMECF.

Respectfully submitted,

BY: /s/ Frank Quintero, Jr.
FRANK QUINTERO, JR.
Fla. Bar 399167